

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

DONNA K. SOUTTER,  
*For herself and on behalf of all  
Similarly situated individuals,*

Plaintiff,

v.

Civil Action No. 3:10-cv-00514-HEH

TRANS UNION, LLC,

Defendant.

**MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT  
AGREEMENT AND CLASS CERTIFICATION FOR SETTLEMENT**

Plaintiff Donna K. Soutter (“Plaintiff”), on behalf of herself and all others similarly situated, pursuant to Fed. R. Civ. P. 23, hereby moves the Court for Preliminary Approval of Class Action Settlement Agreement and Class Certification for Settlement. For the reasons supplied in the accompanying Memorandum in Support, filed herewith, the Plaintiff respectfully requests that the court enter a Preliminary Approval Order:

- (1) preliminarily approving a proposed class settlement,
- (2) scheduling a fairness hearing,
- (3) certifying the proposed settlement class for purposes of the proposed class settlement,
- (4) appointing class counsel, and
- (5) approving the form and manner of notice proposed to be sent to all members of the settlement classes.

The Plaintiff has attached as exhibits to the Memorandum in Support of this motion a Proposed Preliminary Approval Order and Proposed Class Notice.

Respectfully submitted,

**DONNA K. SOUTTER,**  
*For herself and on behalf of all*  
*Similarly situated individuals,*

By: \_\_\_\_\_/s/\_\_\_\_\_

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*Attorneys for Plaintiff and the Class Members*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of December, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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